

Worksheet
Determination of NEPA Adequacy (DNA)
U.S. Department of the Interior
Bureau of Land Management

OFFICE: Humboldt River Field Office (HRFO) Winnemucca District (WD).

TRACKING NUMBER: DOI-BLM-NV-W010-2017-0018-DNA

CASEFILE/PROJECT NUMBER: Refer to parcel numbers listed on the attached list of legal descriptions

PROPOSED ACTION TITLE/TYPE: Geothermal Lease Parcel Nominations for October 2017 sale

LOCATION/LEGAL DESCRIPTION: See attached general and site vicinity maps and list of legal descriptions

APPLICANT (if any): BLM Nevada State Office

A. Description of the Proposed Action with attached map(s) and any applicable mitigation measures.

Who: BLM Nevada State Office (NSO)

What: The NSO is proposing to include in the 2017 geothermal lease sale one (1) nominated geothermal parcel that is located within the area administered by the Humboldt River Field Office (HRFO).

When: October 2017 geothermal lease sale

Where: The single parcel is located around the Hot Springs Mountains, Churchill County. See attached maps and parcel legal descriptions.

Why: The NSO is requesting HRFO to review nominated parcel for conformance with the WDRMP, recommend appropriate lease stipulations, and advise on if the parcel may need to be deferred.

How: The geothermal parcel is being reviewed against the existing National Environmental Policy Act (NEPA) documents to determine if the parcel is open for leasing in the WD and under what conditions. This review includes identifying the
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appropriate geothermal lease stipulations and any necessary Notice to Lessee (NTL) that would be made a part of any subsequent Offer to Lease for Geothermal Resources.

Lease issuance alone does not authorize any ground-disturbing activities to explore for or develop geothermal resources without site-specific approval for the intended operation. Such approval could include additional environmental reviews and permits.

B. Land Use Plan (LUP) Conformance

The Winnemucca District Resource Management Plan (WDRMP) and Final Environmental Impact Statement, May 2015, as amended by the Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region Including the Greater Sage-Grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, and Utah, September 21, 2015 (GRSG Plan Amendment).

The proposed action is in conformance with the applicable WDRMP as amended because it is specifically provided for in the following WDRMP as amended decisions:

WDRMP

Objective MR 4:

Lands within the WD will be open to geothermal and oil and gas leasing and development except where incompatible with important resource values. Protect, manage, and conserve lands acquired in a manner consistent with the goals of the acquisition and the resource values present, in accordance with those Actions described below, and considering the management applied to adjacent public lands.

Action MR 4.1: Maintain 5,492,707 acres as open to leasing. Offer fluid mineral leases in those areas identified as open to leasing (Figure 2-13, Appendix A of the WDRMP). Protect, manage, and conserve important resource values in otherwise open areas by applying stipulations determined to be necessary to reasonably protect other resources as depicted on Figure 2-13, Appendix A and described in the text.

Action MR 4.1.1: 2,851,895 acres will be open with only standard lease terms and stipulations (Figure 2-13, Appendix A of the WDRMP). (Note: Survey for and mitigation of impacts on cultural resources, sensitive species, and migratory birds are considered standard stipulations [see Actions CR 1.1, CR 1.2, SSS 3.2, SSS 6.1.1, SSS 7.1.1, and FW 4.1, see WDRMP Appendix L, Winnemucca Fluid Mineral Lease Sale Stipulations]).

Action MR 4.1.2: 2,435,327 acres will be open, with standard lease terms and stipulations, as well as one or more of the following seasonal or other restrictions listed below (Figure 2-13, Appendix A of the WDRMP):

- a. PMUs that are not within priority wildlife habitat areas (see Action SSS 5.2.2).
- b. Within HMAs, where proposed activities could result in adverse impacts on the health and welfare of WHB (see Action WHB 4.1).
- c. Within defined avoidance areas (See Action LR 5.2).
- d. Within priority watersheds that are not T&E species habitat (see Actions WR 3.2 and WR 3.2.1).
- e. Areas in VRM Class I, II, or III (see Visual Resources Goal, Objective VRM 1, and Action VRM 1.1).

Action MR 4.1.3: 205,485 acres will be open to leasing but subject to a no surface occupancy stipulation, applicable to the following (Figure 2-13, Appendix A of the WDRMP):

- a. No new fluid leasing surface occupancy will be allowed within a mile of the NHT (see Action CR 6.9). To accomplish this, any quarter-quarter-quarter section (10-acre parcel) within or intersected by the trail or the one-mile buffer line will be subject to NSO.
- b. Within an identified TCP listed or considered eligible for the NRHP (see Action TC 2.2.2). To accomplish this, any quarter-quarter-quarter section (10-acre parcel) within or intersected by the TCP will be subject to NSO.
- c. Within the location of an identified paleontological resource classified as being of scientific or educational interest (see Action PR 1.6). To accomplish this, any quarter-quarter-quarter section (10-acre parcel) within or intersected by the site will be subject to NSO.
- d. Priority water supply areas (see Actions WR 3.4).
- e. Within cultural sites that have been determined to be eligible for listing on the NRHP (see Action CR 2.1.1).

Action MR 4.1.3.1: Based on Native American consultation, modifications to no surface occupancy near TCPs or TCP settings may produce recommendations for larger or smaller areas subject to no surface occupancy.

Action MR 4.2: Maintain 1,740,928 acres as closed to leasing. Areas closed to leasing (Figure 2-13, Appendix A of the WDRMP):

- a. Designated WSA or Wilderness (policy);
- b. George Lund Petrified Forest mineral withdrawal (see Actions PR 1. and PR 1.7);

- c. Lovelock Cave right-of-way and proposed mineral withdrawal (Action LR 10.2);
- d. McDermitt Station Administrative Site right-of-way and proposed mineral withdrawal (Action LR 10.2);
- e. Priority Wildlife Habitat Areas and associated PMUs (see Action SSS 5.2.1);
- f. Designated ACECs (see Action ACEC 1.2):
 - 1. Osgood Mountain Milkvetch ACEC (see also Action SSS 3.5),
 - 2. Pine Forest,
 - 3. Raised Bog, and
 - 4. Stillwater (see also Action TC 2.2).
- g. Lands acquired under SNPLMA.
- h. Within priority watersheds that are T&E species habitat (see Action WR 3.2).
- i. Areas closed to OHV use (see Action R 10.1).
- j. Lands acquired under LWCF - automatically closed to all mineral location and entry.
- k. Lands acquired by exchange - closed to mineral location and entry for 90 days and automatically open if BLM doesn't initiate a withdrawal within that time period.
- l. Cultural sites listed on the NRHP.

Action MR 4.2.1: Offer fluid mineral leases to within a quarter mile of a WSA or designated wilderness boundary. To accomplish this, any quarter-quarter section (40-acre parcel) intersected by and including a portion of such a boundary will be excluded from the parcel nominated (IM-NV-2004-093).

Objective MR 5:

Manage fluid mineral operations to provide for the energy needs of the nation, while assuring compatibility with and protection of other resources (per the Energy Policy Act of 2005) (DOI 2005).

Action MR 5.1: In addition to applicable lease stipulations, apply standard conditions of approval as necessary to reasonably protect other resources and meet resource objectives.

Action MR 5.2: Compliance inspections will meet existing policy and be of sufficient frequency and detail to ensure appropriate protection of the public interest in production and resource values.

C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.

1. Programmatic Environmental Impact Statement for Geothermal Leasing in the Western United States, Record of Decision and Resource Management Plan Amendments for Geothermal Leasing in the Western United States, December 2008.
2. BLM Final EIS Record of Decision and Resource Management Plan for the Winnemucca District Planning Area, May 21, 2015.
3. BLM Record of Decision and Approved Resource Management Plan Amendments for the Great Basin Region, Including the Greater Sage-grouse Sub-Regions of Idaho and Southwestern Montana, Nevada and Northeastern California, Oregon, Utah, September 2015.

D. NEPA Adequacy Criteria

1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA documents(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?

Geothermal leasing was evaluated and analyzed in the EIS associated with the WDRMP. A Record of Decision (ROD) was reached on the WDRMP in May 2015. Therefore, the resource allocations made are very current. The single parcel proposed by the NSO is located within areas that are open for fluid mineral leasing either with standard stipulations, with standard and special stipulations or open to leasing with no surface occupancy.

Geothermal leasing is also analyzed in the nationwide programmatic geothermal leasing EIS, ROD 2008.

2. Is the range of alternatives analyzed in the existing NEPA documents(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?

Yes, the nominated geothermal parcel was reviewed with respect to the range of alternatives analyzed in the existing NEPA documents.

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The WDRMP EIS, which analyzed four alternatives in detail, and the EIS associated with the Greater Sage Grouse Plan Amendment (GRSG Plan Amendment) ROD signed September 2015 are very current in light of recent environmental issues, interests, and resources values.

3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?

Yes, the EIS associated with WDRMP is recent and was a comprehensive analysis with extensive public involvement. The WDRMP Appendix L provides fluid lease stipulations. An Interdisciplinary Team (IDT) reviewed the parcel for resource concerns and recommended the appropriate lease stipulations and NTL (see attached parcel worksheets).

4. Are the direct, indirect, and cumulative effects that would result from implementation of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?

Yes, the direct, indirect and cumulative effects of geothermal leasing were specifically analyzed in the WDRMP EIS and covered the geographic areas where the parcel is located. This EIS is recent and has a comprehensive analysis that was developed through extensive public involvement.

5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?

The 2008 Programmatic EIS was made available for a 90-day public comment period and 13 public meetings were held in the 12-western states prior to issuing the Record of Decision.

HRFO solicited comments and responded to concerns from the Nevada Department of Wildlife (NDOW) during the evaluation of this parcel. After their review, NDOW has illuminated that there is in fact a Pronghorn herd present yearlong within the parcel area. NDOW recommends implementing WDO RMP fluid minerals stipulations addressing timing restrictions to protect habitat, the continuity of migration corridors, and to protect seasonal use areas such as fawning and crucial winter habitat. If a geothermal lease is

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sold in any area of concern of NDOWs, the HRFO would evaluate under NEPA any proposed site specific activities and address further conditions that may be necessary for the site as part of the approval procedure for those site specific activities.

There was extensive public involvement in the development of the WDRMP 2015. For public involvement information refer to WDRMP Executive Summary Section 1.9 *Public Involvement, Consultation and Coordination*.

In evaluating this parcel, the HRFO consulted with the Pyramid Lake Paiute Tribe, Lovelock Paiute Tribe and Fallon Paiute Shoshone Tribe.

HRFO made a good faith effort to consult with the Pyramid Lake Paiute Tribe, Lovelock Paiute Tribe and Fallon Paiute Shoshone Tribe and incorporate their concerns into our recommendations. As of 05/24/2017 no response has been received. Native American Consultation continues and future concerns may arise. Should future concerns become evident prior to the time of sale, HRFO will promptly notify the NSO.

E. Persons/Agencies/BLM Staff Consulted

See previous Section D, Part 5 for agencies consulted. For BLM staff consulted, review signatures, and conclusions, see next page. For stipulations and NTL see attached Parcel Worksheets.

Name /Title	BLM Resource Specialist	Signature/Date
Ade Amoo	Project Lead; Humboldt River Field Office	/S/ Ade Amoo 6/19/2017
Evan Myers/Keysha Fontaine	T & E Species; Special Status Species, General Wildlife Habitat	/S/ Evan Myers 6/12/2017
Tanner Whetstone	Cultural Resources; Native American Consultation; Historic Trails; Paleontology	/S/ Tanner Whetstone 6/12/2017
Debbie Dunham	Lands; Realty	/S/ Debbie Dunham 6/12/2017
Brian Older	Recreation	/S/ Brian Older 6/19/2017
Robert Gibson	Riparian; Water	/S/ Robert Gibson 6/12/2017
Robert Burton	Soils	/S/ Robert Burton 6/12/2017
Samantha Gooch	Wild Horse and Burro	/S/ Samantha Gooch 6/12/2017
Wes Barry	Rangeland Management	/S/ Wes Barry 6/14/2017

Note: Refer to the specific EIS for a complete list of the team members participating in the preparation of the original environmental analysis or planning documents.

☒ **Conclusion** *(If you found that one or more of these criteria is not met, you will not be able to check this box.)*

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM' compliance with the requirements of the NEPA.

/S/ Ade Amoo

Signature of Project Lead

/S/ Lynn Ricci

Signature of NEPA Coordinator

/S/ David Kampwerth

6/22/2017

Signature of the Responsible Official

Date

Note: The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.